

United States District Court

DISTRICT OF NEW HAMPSHIRE

United States of America

v.

Ian Freeman

CASE NUMBER: 1:21-cr-00041-JL-01

ASSENTED TO MOTION TO MODIFY COURT'S ORDER
SETTING BAIL CONDITIONS

NOW COMES the Defendant, Ian Freeman, by and through counsel, and requests that certain conditions of the Court's Order, dated December 20, 2021, be modified.

As grounds for and in support of this motion, it states as follows:

1. Ian Freeman awaits trial; anticipated to begin November 1, 2022.
2. The Defendant was released from custody on or about May 25, 2021. The Defendant has complied with his conditions set forth by the Court.
3. Mr. Freeman requests that he be granted the ability to have contact with Mark Edgington.
4. With regard to the named individual in Paragraph #3 of this motion, has not requested that Freeman have no contact with him. Mark Edgington has been working with Freeman for over a decade and is an intricate and essential part of the Free Talk Live Production.
5. No allegations of intimidation or witness tampering has been asserted by Freeman in being restricted from contacting. In fact, Mr. Edgington would invite contact.
6. Counsel has contacted John Kennedy, Esq. and Georgiana L. MacDonald, Esq., of the U.S. District Attorney's Office, and have no objection to the granting of this motion.

7. No legal memorandum accompanies this motion as the relief requested is fully set out herein.

8. A hearing is requested on this matter.

WHEREFORE, the Defendant request this Honorable Court, to:

A. Amend the Court's Order Setting Bail Conditions as outlined on December 20, 2021 and allow:

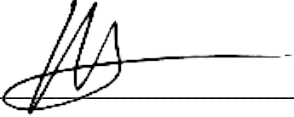
- i. Contact with Mark Edgington; and
- ii. Speak openly about any issue, except for the subject of the prosecution related to this pending matter.

B. Schedule a hearing regarding this matter.

C. Such other relief as the Court deems just and equitable.

February 24, 2022

Date


Signature

Mark L. Sisti

Print Name

387 Dover Road

Address

Chichester, NH 03258

City

State

Zip Code

(603) 224-4220

Phone Number

CERTIFICATION

I hereby certify that a copy of this appearance was forwarded to Assistant United States Attorneys John Kennedy and Georgiana L. MacDonald, electronically through EFC on February 24, 2022.

February 24, 2022

Date


Signature

Mark L. Sisti

Print Name